



State of Ohio Environmental Protection Agency

Northwest District Office

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RECEIVED  
SEP 06 2005  
AIR ENFORCEMENT  
U.S. EPA REGION 5  
Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph R. Kencelik, Director

Re: Defiance County  
SK Handtool Corporation  
Premise # 0320010139  
Complaint Investigation  
**Notice of Violation**

August 31, 2005

CERTIFIED MAIL

Mr. Jeff Baden  
SK Handtool Corporation  
135 Hickory Street  
Defiance, Ohio 43512

Dear Mr. Baden:

This letter shall serve as a follow-up to the information received by our office concerning the air pollution sources at the above facility from the company and KPRG and Assoc. SK Handtool Corp's (SK) environmental consultant. The Division of Air Pollution Control (DAPC) at the Northwest District Office (NWDO) continues to receive complaints regarding the rust colored particulates released from the company's shotblast and polishing/grinding operations.

Over a year ago SK installed Tribo Leak Detection Systems on the shotblast baghouse and on the North and South cartridge filters. According to our conversation on August 4, 2005, the company has hired the installation contractor of the Tribo Leak devices, to evaluate the overall performance of the leak detection systems. Please submit to our office, a copy of the report summarizing the results of the contractor's leak detection investigation.

According to KPRG's letter received on July 5, 2005, SK has installed 25 individual polishing/grinding stations at the facility. All of these stations are vented to either the North or South cartridge filters. The company has removed the 1.0 ton/hr shotblaster (P015) from the facility. Both the 3.0 ton/hr and 2.5 ton/hr shotblasters (P006 and P014 respectively), are vented to the shotblast baghouse. For permitting purposes, please submit the installation dates for each of the 25 polishing/grinding stations along with the dates when either of the shotblasters were replaced. In addition, please supply our office with a description of the procedures for handling the disposal of dust collected in the baghouse and cartridge filters.

The company also installed two 197 HP diesel-fired air compressors, without obtaining a permit to install (PTI) and permit to operate (PTO) for these emissions units. This is a violation of OAC rule 3745-31-02, OAC rule 3745-35-02, and ORC 3704.05.



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As a follow-up to the Notice of Violation and the complaints received, this office is requesting a written response, to each of the items addressed above, from the company by September 30, 2005. The response should also outline any additional actions taken by SK to reduce the amount of emissions from the air pollution control devices.

Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Should you have any questions and/or comments concerning this letter, please contact me at the above address or call (419) 373-3136.

Sincerely,



Jay P. Liebrecht  
Division of Air Pollution Control

/llr

pc: Don Waltermeyer, DAPC-NWDO  
Tom Kalman, DAPC, CO  
Lisa Holscher, US EPA-Region V  
DAPC-NWDO Follow-up File  
DAPC-NWDO File